

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

DOLORES GAULIN

VS.

C.A. No.: 1:18-cv-00298

LINCOLN FINANCIAL GROUP

COMPLAINT

PARTIES AND JURISDICTION

1. The Plaintiff, Dolores Gaulin is a resident of the Town of North Smithfield, State of Rhode Island, brings this complaint on her own behalf as a beneficiary under a long term disability insurance policy and life insurance issued to her through her employer,

2. The defendant, Lincoln Financial Group, is an ERISA Welfare Benefit Plan within the meaning of ERISA, 29 USC§1002(1), and this Court has jurisdiction under 29 USC§1144.

3. The plaintiff was an employee of Brown University, on and prior to May 27, 2014, and by virtue of said employment was a certificate holder of said long term disability benefit plan issued by the defendant.

4. While in the employ of, Brown University the plaintiff became totally disabled as defined in the certificate of long term disability benefits.

5. On or about May 24, 2014, the plaintiff was no longer able to perform her job duties.

7. The plaintiff duly filed a claim for short term disability benefits and a waiver of life insurance premiums as required by the policy described above.

8. The plaintiff has made repeated request upon the Defendants for benefits and has complied with all request made upon her.

9. Defendants have willfully and wrongfully refused to pay benefits due the plaintiff under the aforementioned policy.

10. The defendants' failure to pay the benefits due the plaintiff is a breach of its obligation under the policy.

WHEREFORE, the plaintiff, Andrea Pariseau, demands judgment against the defendant, Lincoln Financial Corporation, in an amount equal to the coverage provided by said plan, plus interest, costs and attorney fees.

Plaintiff,
Dolores Gaulin,
By her Attorney,

/s/ Anthony J. Gianfrancesco, Esq.
Anthony J. Gianfrancesco, Esq. (#2762)

/s/ Kayla S. O'Connor, Esq.
Kayla S. O'Connor, Esq. (#9491)

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Dated: June 7, 2018